

Lauren M. Moyer, Esq.  
Friedman Vartolo LLP  
1325 Franklin Avenue, Suite 160  
Garden City, NY 11530  
Attorneys for Select Portfolio Servicing, Inc. as  
Servicer for U.S. Bank National Association, not in its individual capacity but solely as indenture  
trustee, for the holders of the CIM Trust 2020-R4, Mortgage-Backed Notes, Series 2020-R4  
P: (212) 471-5100  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

-----X

In re:

Patricia A Brown aka Patricia Anne Brown  
aka Pat Brown aka Patricia A. Tucker  
Debtor.

: CASE NO.: 22-11904-elf  
: CHAPTER: 13  
: HON. JUDGE.:  
: Eric L. Frank  
:  
: HEARING DATE:  
: October 18, 2022 at 10:00 am  
:  
:  
-----X

**NOTICE OF OBJECTION TO CONFIRMATION OF PLAN**

**PLEASE TAKE NOTICE** that Select Portfolio Servicing, Inc. as Servicer for U.S. Bank National Association, not in its individual capacity but solely as indenture trustee, for the holders of the CIM Trust 2020-R4, Mortgage-Backed Notes, Series 2020-R4 (“Secured Creditor”), the holder of a mortgage on real property of the Debtor located at 4 Sweetbriar Road, Coatesville, PA 19320, by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Plan on grounds including:

1. Debtor’s proposed plan is insufficient to provide for the claim of Secured Creditor. The objecting creditor is due arrears of approximately \$51,533.34 to be set forth in a Claim to be filed by the Claims Deadline.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C. 1325(a)(4) and 1325(b), et seq. unless the plan provides for full payment of the claim.

Dated: Garden City, NY  
September 13, 2022

By: /s/ Lauren M. Moyer  
Lauren M. Moyer, Esq.  
FRIEDMAN VARTOLO LLP  
Attorneys for Select Portfolio Servicing, Inc. as  
Servicer for U.S. Bank National Association, not in  
its individual capacity but solely as indenture  
trustee, for the holders of the CIM Trust 2020-R4,  
Mortgage-Backed Notes, Series 2020-R4  
1325 Franklin Avenue, Suite 160  
Garden City, NY 11530  
T: (212) 471-5100  
F: (212) 471-5150

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	Patricia A Brown aka Patricia Anne Brown aka Pat Brown aka Patricia A. Tucker, Debtor	Case No. 22-11904-elf Chapter: 13 Judge: Eric L. Frank
	Select Portfolio Servicing, Inc. as servicer for U.S. Bank National Association, not in its individual capacity but solely as indenture trustee, for the holders of the CIM Trust 2020-R4, Mortgage-Backed Notes, Series 2020-R4, Movant v. Patricia A Brown aka Patricia Anne Brown aka Pat Brown aka Patricia A. Tucker Kenneth E. West – Trustee, Respondents	

**CERTIFICATE OF SERVICE OF OBJECTION TO CONFIRMATION OF PLAN**

The undersigned counsel for Select Portfolio Servicing, Inc. as servicer for U.S. Bank National Association, not in its individual capacity but solely as indenture trustee, for the holders of the CIM Trust 2020-R4, Mortgage-Backed Notes, Series 2020-R4 ("Secured Creditor") certify that, on the date stated hereon, I caused to be served a copy of the Objection to Confirmation of Plan filed on behalf of Secured Creditor on the parties in the manner specified on the attached service list.

The type(s) of service made on the parties was: electronic notification or first-class mail, postage pre-paid. Where service is by electronic notification, the address of the party is listed for identification purposes only.

EXECUTED ON: September 13, 2022

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer  
Lauren M. Moyer, Esquire  
FRIEDMAN VARTOLO LLP  
Attorneys for Movant  
1325 Franklin Avenue, Suite 160  
Garden City, New York 11530  
T: (212) 471-5100  
F: (212) 471-5150  
Bankruptcy@FriedmanVartolo.com

**Service by NEF**

**Trustee**

KENNETH E. WEST  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

**Debtor's Counsel**

RONALD J. PRESSLEY  
Ronald J. Pressley, Esquire  
1015 Chestnut Street  
Suite 907  
Suite 907  
Philadelphia, PA 19107

**U.S. Trustee**

Office of United States Trustee  
Robert N.C. Nix Federal Building  
900 Market Street  
Suite 320  
Philadelphia, PA 19107

**Service by First-Class Mail**

**Debtor**

Patricia A Brown aka Patricia Anne Brown  
aka Pat Brown aka Patricia A. Tucker  
4 Sweetbriar Road  
Coatesville, PA 19320-6108